

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY,
IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

Jointly Administered

**MOTION BY THE SECURED BONDHOLDER REPRESENTATIVES
FOR ENTRY OF AN ORDER (I) CONTINUING THE DISTRIBUTION
MOTION HEARING SET FOR FEBRUARY 22, 2024,
AND (II) GRANTING RELATED RELIEF**

Computershare Trust Company, N.A., as Master Trustee (the “Master Trustee”), and Preston Hollow Community Capital, Inc., as Bondholder Representative (the “Bondholder Representative” and, collectively with the Master Trustee, the “Secured Bondholder Representatives”), hereby move (the “Motion”) pursuant to Local Rule of Bankruptcy Practice and Procedure 9006-1 for entry of an order substantially in the form attached hereto as **Exhibit A** granting the relief requested below.

1. On January 11, 2024, the Secured Bondholder Representatives filed the *Secured Bondholder Representatives’ Motion for Entry of an Order Authorizing and Directing the Distribution of Proceeds from the Sale of the Debtors’ Assets and for Relief from Stay* [Docket No. 626] (the “Distribution Motion”).

2. Also on January 11, 2024, the Debtors, the Official Committee of Unsecured Creditors (the “Committee”), and the Secured Bondholder Representatives entered into the *Amended Stipulation and Agreement Regarding Cash Collateral* [Docket No. 649, Exhibit A] (the “Amended Stipulation”), pursuant to which the parties agreed that the hearing on the Distribution

Motion should be continued from February 7, 2024 until February 22, 2024 (the “DM Hearing”), and that the Committee’s deadline to object to the Distribution Motion would be February 15, 2024 (the “DM Objection Deadline”).

3. Pursuant to a *Second Amended Stipulation and Agreement Regarding Cash Collateral* (the “Second Amended Stipulation”), the parties have reached an agreement to, among other things, continue the DM Hearing to March 27, 2024, without prejudice to any party’s rights to seek further extension of such hearing, and to extend the DM Objection Deadline for the Committee only until March 20, 2024. The Second Amended Stipulation is attached hereto and incorporated herein as **Exhibit B**.

4. Both the Debtors and the Committee consent to this Motion.

WHEREFORE, the Secured Bondholder Representatives pray that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein, and granting such further relief as the Court deems just and equitable.

[Remainder of page left intentionally blank.]

Dated: February 20, 2023

WHITFIELD & EDDY, P.L.C.

/s/ Peter J. Chalik

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing dated February 20, 2024.

/s/ Peter J. Chalik

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